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LT. ANDREW MATHES,
and SGT. RICHTER

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CARL MITCHELL, MICHEAL
ESCOBEDO, SALVADOR ROQUE,
JUDY COLEMAN, as individuals; LOS
ANGELES CATHOLIC WORKER,
CANGRESS, as organizations,

PLAINTIFFS.

V.

CITY OF LOS ANGELES, a municipal entity; LT. ANDREW MATHIS, SGT. HAMER and SGT. RICHTER, in their individual and official capacities.

DEFENDANTS

CASE NO. CV16-01750 SJO (JPRx)
*[Assigned to the Honorable S. James Otero,
Courtroom 10C]*

STIPULATION TO CONTINUE TRIAL AND CUTOFF DATES

[Submitted with proposed order]

Trial: Oct. 9, 2018

Time: 9:00 a.m.

1 **STIPULATION TO CONTINUE TRIAL AND CUTOFF DATES**

2 It is hereby stipulated by and between Plaintiffs and Defendants the City of
3 Los Angeles, Lt. Mathis, Sgt. Hamer and Sgt. Richter (collectively “the City”) as
4 follows:

5 1. On December 4, 2017, the Court issued a Scheduling Order (Dkt. No.
6 107) setting a trial date on October 9, 2018, a final pretrial conference on October 1,
7 2018, and related pre-trial cutoff dates.

8 2. The Parties have been engaged in discussions in an effort to resolve this
9 dispute.

10 3. The Parties have retained Magistrate Judge Carla Woehrle (Ret.) as a
11 private mediator. The Parties have conducted four mediation sessions with Judge
12 Woehrle.

13 4. The Parties desire to continue to engage in further discussions.
14 However, the Los Angeles City Council is currently in recess and is therefore
15 unavailable to provide guidance to the City regarding its discussions in this matter.

16 5. Under the current trial date and related cutoffs in the Scheduling Order,
17 the Parties will be forced to complete substantial discovery, motion practice, and
18 pretrial filings, which will potentially disturb the *status quo* under which the
19 discussions are occurring, negatively impact the Parties’ discussions, and cause the
20 Parties to incur unnecessary attorneys’ fees and costs.

21 6. This is the Parties’ first request to the Court to continue the trial and
22 cutoff dates in this Action.

23 7. The Plaintiffs and the City hereby stipulate, subject to Court approval, to
24 continue the trial date and related pre-trial cutoff dates for discovery, motion practice,
25 and pretrial filings for 120 days and set a trial date of February 6, 2019 (or an
26 alternative date if more convenient to the Court), with related cutoff dates based
27 thereon, to provide additional time for the parties to complete their discussions.

28 It is so stipulated.

1 Dated: July 5, 2018

SCHONBRUN SEPLOW HARRIS &
HOFFMAN LLP

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3 By: _____ /s/
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PAUL L. HOFFMAN
CATHERINE SWEETSER

5
6 Attorneys for Plaintiffs
7

8 Dated: July 5, 2018

LAW OFFICE OF CAROL A. SOBEL

9
10 By: _____ /s/
11

CAROL A. SOBEL

12 Attorneys for Plaintiffs
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14 Dated: July 5, 2018

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LEGAL AID FOUNDATION OF LOS
ANGELES

By: _____ /s/
FERNANDO GAYTAN

SHAYLA R. MYERS

Attorneys for Plaintiffs Carl Mitchell, Judy
Coleman, Michael Escobedo, CANGRESS,
and Los Angeles Catholic Worker

Dated: July 5, 2018

LOS ANGELES CITY ATTORNEY'S OFFICE

By: _____ /s/
FELIX LEBRON

Attorneys for Defendants

All parties have authorized the use of their electronic signatures for this document.